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CLERK US DISTRICT COURT DISTRICT OF NEVADA	
BY: _____	DEPUTY _____

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8  
 9 **UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

10 UNITED STATES OF AMERICA,

11 Plaintiff,

12  
13 v.

14  
15 PETER JAMES CARIANI,

16 Defendant.

Case No. 3:17-cr-00062-LRH-CLB

**SUPERSEDING INDICTMENT**

Violations:

Title 18, United States Code, Section  
1832(a)(2) (Transmission of Trade Secrets)  
(Counts One and Three)

Title 18, United States Code, Sections  
1832(a)(2) and (4) Attempted Transmission  
of Trade Secrets (Counts Two and Four)

17 **THE GRAND JURY CHARGES THAT:**

18 **COUNT ONE**

19 (Transmission of Trade Secret)

20 On or about April 7, 2015, in the State and Federal District of Nevada,

21 **PETER JAMES CARIANI,**

22 defendant herein, did, knowingly and without authorization, copy, duplicate, download, upload,  
 23 replicate, transmit, and convey trade secret information owned by Sierra Nevada Corporation and  
 24 related to the Radar Enhanced Vision Systems (REVs) project, a product used in, and intended for

1 use in, interstate and foreign commerce, to wit, the following electronic files and information  
2 contained therein:

- 3 1. Algorithm Definition Document DOC-03009507-01.docx
- 4 2. RSU Performance Analysis.xlsx
- 5 3. REVS 2014-2016 IRAD Charter.doc
- 6 4. FEDEX Competitive Intelligence.pptx
- 7 5. 03002101-01\_A\_V95\_XC23\_18Dec2014.pcb (Printed Circuit Board Layout for RSU Radar  
8 Controller)
- 9 6. 03002201-01\_A\_V95\_Archive.pcb (Printed Circuit Board Layout for RSU Servo  
10 Controller)
- 11 7. 03002301-01\_A\_Archive-06jan15alm.pcb (Printed Circuit Board Layout for RSU  
12 Transceiver),

13 with the intent to convert a trade secret to the economic benefit of anyone other than Sierra  
14 Nevada Corporation, and knowing and intending that the offense would injure Sierra Nevada  
15 Corporation.

16 All in violation of Title 18, United States Code, Section 1832(a)(2).

17 **COUNT TWO**

18 (Attempted Transmission of Trade Secret)

19 On or about April 7, 2015, in the State and Federal District of Nevada,

20 **PETER JAMES CARIANI,**

21 defendant herein, did, knowingly and without authorization, attempt to copy, duplicate,  
22 download, upload, replicate, transmit, and convey, trade secret information owned by Sierra  
23 Nevada Corporation and related to the Radar Enhanced Vision Systems (REVs) project, a product  
24 used in, and intended for use in, interstate and foreign commerce, to wit, the following electronic  
files and information contained therein:

1. Algorithm Definition Document DOC-03009507-01.docx

- 1 2. RSU Performance Analysis.xlsx
- 2 3. REVS 2014-2016 IRAD Charter.doc
- 3 4. FEDEX Competitive Intelligence.pptx
- 4 5. 03002101-01\_A\_V95\_XC23\_18Dec2014.pcb (Printed Circuit Board Layout for RSU Radar  
5 Controller)
- 6 6. 03002201-01\_A\_V95\_Archive.pcb (Printed Circuit Board Layout for RSU Servo  
7 Controller)
- 8 7. 03002301-01\_A\_Archive-06jan15alm.pcb (Printed Circuit Board Layout for RSU  
9 Transceiver IF),

10 with the intent to convert a trade secret to the economic benefit of anyone other than Sierra  
11 Nevada Corporation, and knowing and intending that the offense would injure Sierra Nevada  
12 Corporation.

13 All in violation of Title 18, United States Code, Sections 1832(a)(2) and (a)(4).

14 **COUNT THREE**  
(Transmission of Trade Secret)

15 On or about or between April 30, 2015 and May 1, 2015, in the State and Federal District  
16 of Nevada,

17 **PETER JAMES CARIANI,**  
18 defendant herein, did, knowingly and without authorization, transmit, deliver, send, mail,  
19 communicate, and convey a trade secret owned by Sierra Nevada Corporation and related to the  
20 Radar Enhanced Vision Systems (REVs) project, a product used in, and intended for use in,  
21 interstate and foreign commerce, that is, information described as "Business Case" information  
22 contained in electronic files identified as Ideasummary.pdf, Ideasummary.pdf.edits, and  
23 Ideasummary\_v2.pdf, with the intent to convert a trade secret to the economic benefit of anyone  
24

1 other than Sierra Nevada Corporation, and knowing and intending that the offense would injure  
2 Sierra Nevada Corporation.

3 All in violation of Title 18, United States Code, Section 1832(a)(2).

4 **COUNT FOUR**

5 (Attempted Transmission of Trade Secret)

6 On or about or between April 30, 2015 and May 1, 2015, in the State and Federal District  
7 of Nevada,

8 **PETER JAMES CARIANI,**

9 defendant herein, did, knowingly and without authorization, attempt to transmit, deliver, send,  
10 mail, communicate, and convey a trade secret owned by the Sierra Nevada Corporation and  
11 related to the Radar Enhanced Vision Systems (REVs) project, a product used in and intended for  
12 use in interstate and foreign commerce, that is, information described as "Business Case"  
13 information contained in electronic files identified as Ideasummary.pdf, Ideasummary.pdf.edits,  
14 and Ideasummary\_v2.pdf, with the intent to convert a trade secret to the economic benefit of  
15 anyone other than Sierra Nevada Corporation, and knowing and intending that the offense would  
16 injure Sierra Nevada Corporation.

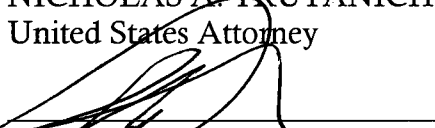
17 All in violation of Title 18, United States Code, Sections 1832(a)(2) and (4).

18 *Date: Feb. 20, 2020*

A TRUE BILL:

19 *7/5/*  
20 \_\_\_\_\_  
FOREPERSON OF THE GRAND JURY

21 **NICHOLAS A. TRUTANICH**  
United States Attorney

22   
23 **STEVEN W. MYHRE**  
24 **RANDOLPH J. ST. CLAIR**  
Assistant United States Attorneys